

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LOLA INGRAM,

Plaintiff(s),

Docket No. 19-cv-10246 (JGK)

-against-

**[PROPOSED] JUDGMENT
PURSUANT TO RULE 68**

THE CITY OF NEW YORK,
STEVEN BANKS, as COMMISSIONER OF THE
NEW YORK CITY HUMAN RESOURCES
ADMINISTRATION, DEPARTMENT OF
SOCIAL SERVICES and FELICIA ELLIS,

Defendant(s)

WHEREAS, on November 7, 2019, Plaintiff LOLA INGRAM filed a summons and complaint in this action, and on August 9, 2022 filed an amended complaint, alleging violations of her rights under the Americans with Disabilities Act of 1990 (“ADA”), 42 U.S.C. §12101 *et seq.*, and §§8-107(1)(a) and 8-107(15)(a) of the Administrative Code of the City of New York; and

WHEREAS, on August 19, 2022, pursuant to Fed. R. Civ. P. 68, Defendants, THE CITY OF NEW YORK, STEVEN BANKS, as COMMISSIONER OF THE NEW YORK CITY HUMAN RESOURCES ADMINISTRATION, DEPARTMENT OF SOCIAL SERVICES and FELICIA ELLIS (collectively “Defendants”) served on the Plaintiff an Offer of Judgment in favor of Plaintiff; and

WHEREAS, on September 2, 2022, Plaintiff accepted the Defendants' offer (ECF No. 87).

NOW, THEREFORE, IT IS HEREBY ORDERED THAT:

1. Defendants shall pay Plaintiff Twenty-Five Thousand and One Dollars and

Zero Cents (\$25,001.00), plus reasonable attorneys' fees, expenses, and costs accrued to date, for all claims that have been, or could have been asserted in the Amended Complaint to the date of this offer;

2. This judgment shall be in full satisfaction of all federal, state, and city law claims or rights that Plaintiff may have to damages, or any other form of relief, arising out of the alleged acts or omissions of the following Defendants, both served and unserved; Defendants Banks and Ellis, or any official, employee, or agent, either past or present, of the New York City Human Resources Administration ("HRA") or of the City of New York, or any agency thereof, in connection with the facts and circumstances that are the subject of this action, from the beginning of the world to the date of Plaintiff's acceptance of this Offer of Judgment.

3. This Offer of Judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by Defendants or any official, employee, or agent of the HRA or, the City of New York, or any agency thereof; nor is it an admission that Plaintiff has suffered any damages; and

4. Acceptance of this Offer of Judgment will act to release and discharge Defendants, their successors or assigns, and all past and present officials, employees, representatives and agents of the HRA, or the City of New York, or any agency thereof, from any and all claims that were or could have been alleged by Plaintiff in the above-captioned action, from the beginning of the world to the date of Plaintiff's acceptance of this Offer of Judgment.

5. Acceptance of this Offer of Judgment also will operate to waive Plaintiff's rights to

any claim for interest on the amount of the judgment.

DATED: 6/20/23

SO ORDERED: 